

MSM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

14 M 1089

-X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

ARLINCY ERSKINE,

Defendant.

-X

EASTERN DISTRICT OF NEW YORK, SS:

JAMES HOLT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about December 19, 2014, within the Eastern District of New York and elsewhere, the defendant ARLINCY ERSKINE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about December 19, 2014, the defendant ARLINCY ERSKINE arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines flight number 526 from Georgetown, Guyana.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant ARLINCY ERSKINE was selected for a Customs and Border Protection (“CBP”) examination.

3. The defendant ARLINCY ERSKINE presented one brown “Phoenix” carryon bag and one black “Betty Boop” checked bag for inspection. In sum and substance, the defendant claimed ownership of the two suitcases and their contents and stated that she had packed her own bags.

4. During an examination of “Phoenix” suitcase, the CBP Officer noticed that the bag felt unusually heavy, noticed a strong odor emanating from the bag, and discovered that the suitcase had a false bottom.

5. ARLINCY ERSKINE was then escorted to a private search area where the false bottom of the suitcase was probed revealing a white powdery substance. The substance was field-tested and tested positive for cocaine. The total approximate gross weight of the cocaine recovered from the defendant was 1.6322 kilograms. The defendant ARLINCY ERSKINE was then placed under arrest and CBP contacted agents from the Department of Homeland Security, Homeland Security Investigations (“HSI”).

6. WHEREFORE, your deponent respectfully requests that defendant
ARLINCY ERSKINE be dealt with according to law.

Dated: Brooklyn, New York
December 20, 2014



JAMES HOLT
Special Agent
Homeland Security Investigations

Sworn to before me on
the 20th day of December, 2014

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK